

February 4, 2003

Mr. Norman Smiley
Dow AgroSciences
9330 Zionsville Road, Indianapolis, IN 46268
Marion, Indiana 46565

Re: 097-16544-00259
First Administrative Amendment to
FESOP 097-15205-00259

Dear Mr. Smiley:

Dow AgroSciences was issued a permit on June 24, 2002 for an office and research & development facility. A letter requesting permission to add portable equipment for conducting limited milling of genetically modified corn was received on December 06, 2002. Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows:

1. Correction of a typographical error in permit condition A.3 [326 IAC 2-8-10(a)(1)].
2. Addition of portable equipment for conducting limited milling of genetically modified corn. This equipment will be used in support of research and development of new products. Emissions from the portable equipment will be controlled through the existing baghouse identified as emission unit ID 301-DC. The potential to emit PM from this new equipment is 0.00307 tons per year before controls and is considered as an insignificant unit, pursuant to 326 IAC 2-7-1(21).

Therefore, IDEM, OAQ and OES have made the following changes to Condition A.3(1), A.3(10) and D.4 to reflect the correction of the typographical errors and for the installation and operation of the new portable equipment used for the corn milling process.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20) (21):

- (1) Emissions Unit ID 301-DC. Research and development of formulations for plant and animal herbicide and pesticide products. This emission unit includes a batch mixer, fluid bed dryer, ~~and~~ mills, **and portable milling equipment**. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.
- (10) a laboratory as defined in 326 2-7-1(20) (21)(G) (D).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activity

- (a) Emissions Unit ID 301-DC. Research and development of formulations for plant and animal herbicide and pesticide products. This emission unit includes a batch mixer, fluid bed dryer, ~~and~~ mills, **and portable milling equipment**. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

The City of Indianapolis, Office of Environmental Services (OES) has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Ms. Monica Dick, Office of Environmental Services, 2700 South Belmont Avenue, Indianapolis, Indiana 46221.

Sincerely,

Original Signed by John B. Chavez
John B. Chavez, Administrator
Office of Environmental Services

Attachments

ERG/SD

cc: File
U.S. EPA, Region V
Mindy Hahn - IDEM
Matt Mosier - Compliance
Monica Dick - Permits

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Dow AgroSciences
9330 Zionsville Road
Indianapolis, Indiana 46268**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-15205-00259	
Issued by: John B. Chavez, Administrator Office of Environmental Services	Issuance Date: 6-24-02 Expiration Date: 6-24-07
First Administrative Amendment No.: 097-16544-00259	Pages affected: 6, 30
Issued by: Original Signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: February 4, 2003

- (7) Emissions Unit ID 5309-07; Stack/Vent ID No. 308-1. One (1) natural gas-fired Bryan Steam Corporation Boiler. Maximum rated heat input capacity is 10.5 MMBtu/hr. Installation date was December 1993.
- (8) Emissions Unit ID 5309-08; Stack/Vent ID No. 308-1. One (1) natural gas-fired Bryan Steam Corporation Boiler. Maximum rated heat input capacity is 10.5 MMBtu/hr. Installation date was December 1993.
- (9) Emissions Unit ID 5309-09; Stack/Vent ID No. 306-2. One (1) diesel fuel fired 1000 kW/hr electrical backup generator. Maximum rated heat input capacity is 9.38 MMBtu/hr and 3,686 HP/hr. Installation date was December 1993.
- (10) Emissions Unit ID 5309-10; Stack/Vent ID No. 308-2. One (1) diesel fuel fired 1000 kW/hr electrical backup generator. Maximum rated heat input capacity is 9.38 MMBtu/hr and 3,686 HP/hr. Installation date was December 1993.
- (11) Emissions Unit ID 310-1. One CBT Wearparts Soil Pulverizer, with a maximum operating capacity of 40 ton/hr installed in 1999.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Emissions Unit ID 301-DC. Research and development of formulations for plant and animal herbicide and pesticide products. This emission unit includes a batch mixer, fluid bed dryer, mills, and portable milling equipment. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.
- (2) natural gas-fired combustion sources with heat input equal to, or less than, 10 MMBTU per hour.
- (3) storage tanks with capacities less than, or equal to, 1,000 gallons and annual throughputs less than 12,000 gallons.
- (4) closed loop heating and cooling systems.
- (5) noncontact cooling tower systems with forced and induced draft not regulated under a NESHAP.
- (6) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (7) blowdown for any of the following: sight glass; boiler; compressor; pump; and cooling tower.
- (8) on-site fire and emergency response training approved by the department.
- (9) filter or coalescer media change out.
- (10) a laboratory as defined in 326 IAC 2-7-1(21)(D).
- (11) soil handling associated with greenhouse research and development.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activity

- (1) Emissions Unit ID 301-DC. Research and development of formulations for plant and animal herbicide and pesticide products. This emission unit includes a batch mixer, fluid bed dryer, mills and portable milling equipment. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emission rate from Emissions Unit ID 301-DC shall not exceed the 2.02 pound per hour emission rate, when P = 0.35 tons per hour, established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour